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February 27, 2007

Judge Gregory M. Sleets
U.S. District Court
District of Delaware
844 N. King St., Lock Box 8
Wilmington, DE 19801

RE: William Allen Newsom v. FCM
Civil Action No. 05-673 (GMS)

Dear Judge Sleets:

This letter is in regards to plaintiff's Motion for Default Judgment, D.I. 43, filed February 15, 2007. Plaintiff's Motion for Default Judgment was filed on the basis that First Correctional Medical did not respond to plaintiff's discovery requests issued in early December 2006. Plaintiff's Motion for Default Judgment has been characterized by the Court's e-filing service as a second request for interrogatories.

This letter serves to request an extension to answer the interrogatories and other requests for production that have been filed by the plaintiff. It additionally serves to clarify that this Court does not consider a Motion for Default Judgment to be pending against First Correctional Medical. I would like to note that an answer has been filed in this case in response to the Complaint and there has never been a motion to compel filed regarding the plaintiff's outstanding discovery. Furthermore, the discovery that plaintiff seeks responses to was filed in early December and the stay of this matter was not lifted until December 19, 2006.

As I will be out of the office from March 1-10, 2007, and my client is no longer in the State of Delaware, I request a 60-day extension to answer plaintiff's discovery requests.

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Please do not hesitate to contact me should you have any questions or concerns on anything contained herein. I remain,

Respectfully yours,

/s/ Dana Spring Monzo
Dana Spring Monzo

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cc: William Allen Newsom
Eileen Kelly, Esquire